

1 PHILLIP A. TALBERT
United States Attorney
2 KEVIN C. KHASIGIAN
Assistant U. S. Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700
5 Attorneys for the United States
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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
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11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 APPROXIMATELY \$48,500.00 IN
15 U.S. CURRENCY,
16 Defendant.

2:21-MC-00012-MCE-DB

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimants
18 Xiaobing Wang, Min Guo, and Lianfeng Li, (“claimants”), by and through their respective counsel as
19 follows:

20 1. On or about September 23, 2020, the Homeland Security Investigations seized the above-
21 referenced defendant asset pursuant to a State search and seizure warrant (hereafter “defendant asset”).

22 2. Under 18 U.S.C. §§ 983(a)(1)(A)(i)-(iv), and 983(a)(3)(A), the United States is required to
23 send notice to potential claimants, file a complaint for forfeiture against the defendant currency, or obtain
24 an indictment alleging that the defendant currency is subject to forfeiture within ninety days of seizure,
25 unless the court extends the deadline for good cause shown or by agreement of the parties. That deadline
26 was January 20, 2021.

27 3. By Stipulation and Order filed January 22, 2021, the parties stipulated to extend to April
28 20, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the

1 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
2 forfeiture.

3 4. By Stipulation and Order filed April 28, 2021, the parties stipulated to extend to June 18,
4 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
5 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
6 forfeiture.

7 5. By Stipulation and Order filed June 21, 2021, the parties stipulated to extend to August 17,
8 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
9 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
10 forfeiture.

11 6. By Stipulation and Order filed August 17, 2021, the parties stipulated to extend to October
12 18, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
13 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
14 forfeiture.

15 7. By Stipulation and Order filed October 22, 2021, the parties stipulated to extend to
16 December 17, 2021, the time in which the United States is required to file a civil complaint for forfeiture
17 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
18 subject to forfeiture.

19 8. By Stipulation and Order filed December 22, 2021, the parties stipulated to extend to
20 February 15, 2022, the time in which the United States is required to file a civil complaint for forfeiture
21 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
22 subject to forfeiture.

23 9. By Stipulation and Order filed February 16, 2022, the parties stipulated to extend to May
24 16, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
25 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
26 forfeiture.

27 10. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
28 to August 15, 2022, the time in which the United States is required to file a civil complaint for forfeiture

1 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
2 subject to forfeiture.

3 11. Accordingly, the parties agree that the deadline by which the United States shall be
4 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
5 alleging that the defendant currency is subject to forfeiture shall be extended to August 15, 2022.

6 Dated: 5/12/2022

PHILLIP A. TALBERT
United States Attorney

8 By: /s/ Kevin C. Khasigian
9 KEVIN C. KHASIGIAN
10 Assistant U.S. Attorney

11 Dated: 5/12/2022

12 /s/ Mark J. Reichel
13 MARK J. REICHEL
14 Attorney for Potential Claimants
15 Xiaobing Wang, Min Guo, and Lianfeng Li
16 (Signature authorized by email)

17 IT IS SO ORDERED.

18 Dated: May 24, 2022

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20 MORRISON C. ENGLAND, JR.
21 SENIOR UNITED STATES DISTRICT JUDGE
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